REMARKS

Applicant respectfully requests reconsideration of this application in view of the following remarks. Claims 31, 32, 39, 40, 47 and 48 have been cancelled. Claims 1, 8, 15, 25-30, 33-38 and 41-46 are pending.

Rejection of the claims

The most recent Office Action rejected claims 1, 8 and 15 under 35 U.S.C. § 102(e) as being anticipated by U.S. Patent No. 6,992,687 ("Baird").

Claim 1 recites:

1.   A method performed by a computer system, comprising:
        storing an electronic version of a paper, wherein the electronic version is displayable on a display device as a likeness of the paper; and
        in response to content of a first portion of the likeness, forming a hyperlink reference and embedding the hyperlink reference within the first portion of the likeness, wherein the hyperlink reference is associated with a second portion of the likeness, such that when the first portion of the likeness is displayed on the display device, at least a portion of the content is selectable by a user to cause the computer system to display the second portion of the likeness on the display device, and wherein the content is at least one of the following: a term that indicates a location at which the second portion of the likeness is located within the paper; and a phrase that indicates the location.

Claim 8 recites:

8.   A system, comprising:
a computing device for:
        storing an electronic version of a paper, wherein the electronic version is
            displayable on a display device as a likeness of the paper; and
        in response to content of a first portion of the likeness, forming a hyperlink
            reference and embedding the hyperlink reference within the first
            portion of the likeness, wherein the hyperlink reference is associated
            with a second portion of the likeness, such that when the first portion
            of the likeness is displayed on the display device, at least a portion of
            the content is selectable by a user to cause the computing device to
            display the second portion of the likeness on the display device, and
            wherein the content is at least one of the following: a term that
            indicates a location at which the second portion of the likeness is
            located within the paper; and a phrase that indicates the location.

Claim 15 recites:

15.   A computer program product stored on a tangible computer-readable medium,
comprising:
a computer program processable by a computer system for causing the computer
        system to:
        store an electronic version of a paper, wherein the electronic version is
            displayable on a display device as a likeness of the paper; and
        in response to content of a first portion of the likeness, form a hyperlink
            reference and embed the hyperlink reference within the first portion of
            the likeness, wherein the hyperlink reference is associated with a
            second portion of the likeness, such that when the first portion of the
            likeness is displayed on the display device, at least a portion of the
            content is selectable by a user to cause the computer system to display
            the second portion of the likeness on the display device, and wherein
            the content is at least one of the following: a term that indicates a
            location at which the second portion of the likeness is located within
            the paper; and a phrase that indicates the location.

In MPEP § 2131, the PTO provides that:

> *"[t]o anticipate a claim, the reference must teach every*
> *element of the claim...."*

Therefore, to sustain a rejection of claim 1, Baird must contain all of the above-recited elements in claim 1. However, Baird fails to teach the combination of elements in claim 1. In fact, Baird teaches away from such a combination.

For example, claim 1 recites (in part), "*in response to content of a first portion of the likeness, forming a hyperlink reference* and embedding the hyperlink reference within the first portion of the likeness, wherein the hyperlink reference is associated with a second portion of the likeness, such that when the first portion of the likeness is displayed on the